

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

2025 FEB 23 PM 5:08 CC

**SEALED**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE  
FEDERAL CONTROLLED SUBSTANCES ACT,  
INTERSTATE TRAVEL IN AID OF RACKETEERING, AND MONEY LAUNDERING**

**UNITED STATES OF AMERICA**

**\* CRIMINAL NO. 22-215**

**v.**

**\* SECTION: H**

**DAVID HESTER**

**a/k/a "Goon"**

**WILLIAM LANG**

**SAUL MACEDO-RODRIGUEZ**

**JAVIER CONTRERAS-CASTILLO**

**a/k/a "Gucci"**

**JOSE OMAR VARGAS-DUQUE**

**a/k/a "Omar"**

**DONALD MILLER**

**a/k/a "Duck"**

**DERRICK WASHINGTON**

**a/k/a "Eyes"**

**RODOLFO AVILES-REYES**

**a/k/a "Omar"**

**BRANDIE ROWE**

**ELDER CAMACHO**

**MICHELLE ALVARADO**

**\* VIOLATIONS: 21 U.S.C. § 846**

**21 U.S.C. § 841(a)(1)**

**21 U.S.C. § 841(b)(1)(A)**

**21 U.S.C. § 841(b)(1)(C)**

**18 U.S.C. § 1956(h)**

**18 U.S.C. § 1956(a)(2)(A)**

**18 U.S.C. § 1952(a)(3)**

**18 U.S.C. § 2**

**\* \* \***

**The Grand Jury charges that:**

**COUNT 1**

**(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)**

Beginning on a date unknown, but prior to October 5, 2021, and continuing to on or about September 12, 2022, in the Eastern District of Louisiana and elsewhere, the defendants, **JAVIER CONTRERAS-CASTILLO a/k/a "Gucci," JOSE OMAR VARGAS-DUQUE a/k/a "Omar,"**

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
X Dkt'd \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc.No \_\_\_\_\_

DAVID HESTER a/k/a "Goon," WILLIAM LANG, SAUL MACEDO-RODRIGUEZ, DONALD MILLER a/k/a "Duck," DERRICK WASHINGTON a/k/a "Eyes," RODOLFO AVILES-REYES a/k/a "Omar," BRANDIE ROWE, ELDER CAMACHO, and MICHELLE ALVARADO, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute cocaine and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), Schedule II controlled substances, and heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**QUANTITY OF CONTROLLED  
SUBSTANCES ATTRIBUTABLE TO EACH DEFENDANT**

With respect to the drug conspiracy involved in Count 1, the defendants knew or reasonably should have known, either through their own conduct or the reasonably foreseeable conduct of their co-conspirators that was taken in furtherance of the drug conspiracy, that the scope of the conspiracy involved the following quantities of controlled substances:

| NAME   | Quantity of Controlled Substance(s)  |
|--|--|
| JAVIER CONTRERAS-CASTILLO<br>a/k/a "Gucci"<br>JOSE OMAR VARGAS-DUQUE<br>a/k/a "Omar"<br>WILLIAM LANG<br>DAVID HESTER<br>a/k/a "Goon"<br>RODOLFO AVILES-REYES<br>a/k/a "Omar" | Five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, and four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A). |
| BRANDIE ROWE<br>ELDER CAMACHO<br>MICHELLE ALVARADO   | A quantity of mixture and substance containing a detectable amount of cocaine, a quantity of mixture and substance containing a detectable amount of heroin, and a quantity of mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide  |

| NAME  | Quantity of Controlled Substance(s)   |
|---|---|
|   | (fentanyl), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).  |
| <b>DONALD MILLER</b><br>a/k/a "Duck"<br><b>DERRICK WASHINGTON</b><br>a/k/a "Eyes"<br><b>SAUL MACEDO-RODRIGUEZ</b> | Five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A). |

All in violation of Title 21, United States Code, Section 846.

**COUNT 2**  
**(Conspiracy to Launder Monetary Instruments)**

Beginning on a date unknown, but prior to October 5, 2021, and continuing to on or about September 12, 2022, in the Eastern District of Louisiana and elsewhere, the defendants, **JAVIER CONTRERAS-CASTILLO** a/k/a "Gucci," **JOSE OMAR VARGAS-DUQUE** a/k/a "Omar," **BRANDIE ROWE**, **RODOLFO AVILES-REYES** a/k/a "Omar," **ELDER CAMACHO**, and **MICHELLE ALVARADO**, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is, bulk cash from drug transactions, from a place in the United States, that is the State of Louisiana, to a place outside the United States, that is Mexico, with the intent to promote the carrying on of a specified unlawful activity, to wit: conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count 1, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT 3**  
**(Interstate Travel in Aid of Racketeering)**

On or about May 25, 2022, in the Eastern District of Louisiana and elsewhere, the defendants, **ELDER CAMACHO** and **MICHELLE ALVARADO**, did travel in interstate commerce between the State of Georgia and State of Louisiana, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, as charged in Count 1 of this Superseding Indictment, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and thereafter performed and attempted to perform acts to promote, manage, establish, carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

**COUNT 4**  
**(Interstate Travel in Aid of Racketeering)**

On or about June 17, 2022, in the Eastern District of Louisiana and elsewhere, the defendant, **RODOLFO AVILES-REYES a/k/a "Omar,"** did travel in interstate commerce between the State of Texas and the State of Louisiana, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, as charged in Count 1 of this Superseding Indictment, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and thereafter performed and attempted to perform acts to promote, manage, establish, carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

**COUNT 5**  
**(Possession with Intent to Distribute Cocaine)**

On or about September 12, 2022, in the Eastern District of Louisiana, the defendant, **SAUL MACEDO-RODRIGUEZ**, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1 through 5 of this Superseding Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1 and 5, the defendants, **JAVIER CONTRERAS-CASTILLO a/k/a "Gucci," JOSE OMAR VARGAS-DUQUE a/k/a "Omar," DAVID HESTER a/k/a "Goon," WILLIAM LANG, SAUL MACEDO-RODRIGUEZ, DONALD MILLER a/k/a "Duck," DERRICK WASHINGTON a/k/a "Eyes," RODOLFO AVILES-REYES a/k/a "Omar," BRANDIE ROWE, ELDER CAMACHO, and MICHELLE ALVARADO**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property, constituting or derived from, any proceeds obtained directly or indirectly, as the result of said offenses, and any property used, or intended to be used, in any manner or part to commit, or to facilitate the commission of said offenses.

3. As a result of the offenses alleged in Counts 2 through 4, the defendants, **JAVIER CONTRERAS-CASTILLO a/k/a "Gucci," JOSE OMAR VARGAS-DUQUE a/k/a "Omar," RODOLFO AVILES-REYES a/k/a "Omar," BRANDIE ROWE, ELDER CAMACHO, and MICHELLE ALVARADO**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property,

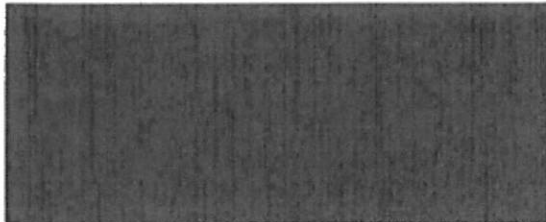


constituting or derived from, any proceeds obtained, directly or indirectly, as the result of said offenses, and any property, used or intended to be used, in any manner or part, to commit or to facilitate the commission of said offenses.

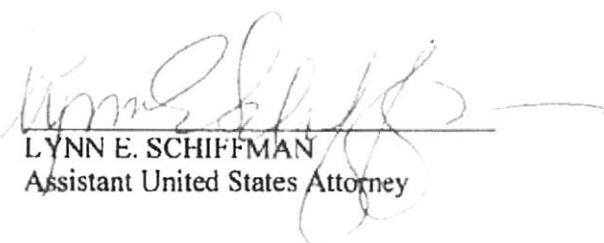
4. If any of the above-described property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

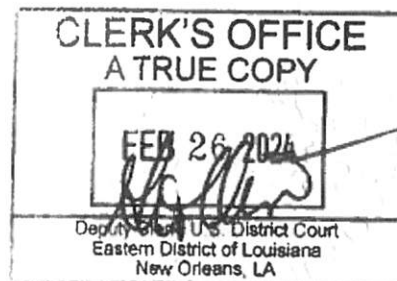
the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendants up to the value of said property.



DUANE A. EVANS  
UNITED STATES ATTORNEY

  
LYNN E. SCHIFFMAN  
Assistant United States Attorney

New Orleans, Louisiana  
February 23, 2024



FORM 08D-34

No. 22-215 "H"

**UNITED STATES DISTRICT COURT**

Eastern District of Louisiana

Criminal Division

**THE UNITED STATES OF AMERICA**

vs.

JAVIER CONTRERAS-CASTILLO, a/k/a "Gucci," JOSE  
OMAR VARGAS-DUQUE, a/k/a "Omar," DAVID HESTER,  
a/k/a "Goon," WILLIAM LANG, SAUL MACEDO-  
RODRIGUEZ, DONALD MILLER, a/k/a "Duck," DERRICK  
WASHINGTON, a/k/a "Eyes," RODOLFO AVILES-REYES,  
a/k/a "Omar," BRANDIE ROWE, ELDER CAMACHO,  
MICHELLE ALVARADO,

**SUPERSEDING INDICTMENT**

**FOR VIOLATIONS OF THE FEDERAL  
CONTROLLED SUBSTANCES ACT, INTERSTATE  
TRAVEL IN AID OF RACKETEERING,  
AND MONEY LAUNDERING**

**VIOLATIONS:** 21 U.S.C. § 846, 21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(A), 21 U.S.C. § 841(b)(1)(C),  
18 U.S.C. § 1952(h), 18 U.S.C. § 1952(a)(2)(A),  
18 U.S.C. § 1952(a)(3), 18 U.S.C. § 2

Filed in open court this \_\_\_\_\_ day of \_\_\_\_\_  
A.D. 2024.

Clerk

Bail, \$ \_\_\_\_\_

Lynn E. Schiffman

Assistant United States Attorney

PER 18 U.S.C. 3170

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENTMatter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☒ Superseding ☒ Defendant Added  
☒ Indictment ☒ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT EASTERN  
DISTRICT OF LOUISIANA Divisional Office

Name and Office of Person  
Furnishing Information on  
THIS FORM Donna V. Knight  
☒ U.S. Atty ☐ Other U.S. Agency  
Phone No. (504) 680-3000

Name of Asst.  
U.S. Attorney  
(if assigned) Lynn E. Schiffman

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court  
(give name of court)

☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)

☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded under

SHOW  
DOCKET NO.

MAG. JUDGE  
CASE NO.

Place of  
offense EDLA

County

CASE NO. 22-215 "H"

USA vs.

Defendant: RODOLFO AVILES-REYES

Address:

☒ Interpreter Required Dialect: Spanish

Birth Date 1984 ☒ Male ☒ Alien  
☐ Female (if applicable)

Social Security Number xxx-xx-0000

## DEFENDANT

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

☐ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any): \_\_\_\_\_

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 3 (for this defendant only)

| Offense Level (1, 3, 4) | Title & Section/<br>(Petty = 1 / Misdemeanor = 3 / Felony = 4) | Description of Offense Charged                                  | Count(s) |
|-------------------------|--|---|----------|
| 4                       | 21 U.S.C. §§ 841(a)(1), 846                                    | Consp. to dist. & poss. w/intent to dist. controlled substances | 1        |
| 4                       | 18 U.S.C. §§ 1956(a)(2)(A), 1956(h)                            | Conspiracy to Launder Monetary Instruments                      | 2        |
| 4                       | 18 U.S.C. § 1952(a)(3)   | Interstate Travel in Aid of Racketeering                        | 4        |
|                         |  |   |          |
|                         |  |   |          |